

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

Famulus Health LLC,

Petitioner,

v.

C/A No. 9:24-cv-00886
C/A No. 9:24-mc-00126
(consolidated)

GoodRx, Inc.,

Respondent.

GoodRx, Inc.,

Petitioner,

v.

Famulus Health LLC,

Respondent.

**GOODRX, INC.’S POST-JUDGMENT REQUESTS FOR THE PRODUCTION OF
DOCUMENTS TO FAMULUS HEALTH LLC**

Pursuant to Federal Rule of Civil Procedure 69, judgment creditor GoodRx, Inc. (“**GoodRx**”) directs the following post-judgment requests for the production of documents (the “**Requests**” and, each, a “**Request**”) to judgment debtor Famulus Health LLC (“**Famulus**”). GoodRx demands that Famulus produce documents and information responsive to the requests for inspection and copying at the offices of Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153 on a rolling basis with such production to be completed on or before November 18, 2024.

DEFINITIONS

1. “Judgment” means the money judgment entered on September 11, 2024 in the above-referenced action between GoodRx and Famulus [Case No. 9:24-mc-00126-BHH, ECF No. 55; Case No. 9:24-cv-00886-BHH, ECF No. 75].

2. “Judgment debtor” or “you” or “your” means Famulus, its subsidiaries, divisions, predecessor and successor companies, affiliates, any partnership or joint venture to which it may be a party, and/or each of its employees, members, agents, officers, directors, representatives, consultants, accountants, and attorneys, including, specifically, Michael Szwajkos, and any person who served in any such capacity at any time during the Relevant Time Period specified herein.

3. “Revenue” or “income” means any and all money, earnings, revenue, or payments of any kind that you received in any form, whether in cash or by check, credit or debit card, electronic transfer, or otherwise, including but not limited to payments for goods and services, payments on accounts receivable, loan repayments, interest income, rents, royalties, license fees, commissions, dividends, distributions, payments relating to sales of Assets, equipment, or inventory, payments on contracts, or any other payment or remuneration you received in connection with the operation of your business.

4. “Asset” means any property or thing of value you owned, claimed, or held any interest in, in whole or in part, including any and all real property, tangible personal property including cash, vehicles, goods, inventory, machinery, equipment, trade fixtures, office equipment, supplies, technology, software, hardware, computer systems and networks, and intangible personal property including goodwill, contracts, accounts receivable, notes receivable, stocks, bonds, and other securities, ownership interest in any other entities such as subsidiary corporations, general or limited partnerships, and joint ventures, intellectual property rights including

copyrights, patents, trademarks, and trade names, and insurance policies which you own or which name you as an insured.

5. The “Relevant Time Period” means the time period from February 1, 2023 to the present.

6. “Document” is used in its broadest sense, and includes any written, printed, typed, recorded, electronic or graphic matter of every type, however and by whomever prepared, produced, reproduced, disseminated or made, in any form, including but not limited to, letters, calendars, correspondence, email, telegrams, memoranda, electronic files, spreadsheets, databases, records, minutes, contracts, agreements, leases, communications, microfilm, bulletins, circulars, pamphlets, studies, reports, notices, diaries, summaries, books, messages, instructions, work assignments, notes, notebooks, drafts, data sheets, data compilations, worksheets, statistics, speeches, tapes, tape recordings, magnetic, photographic, and any other writings or sound recordings. For the avoidance of doubt, “document” includes any version, copy, or reproduction not identical to the original or a produced copy.

7. “Relating to” shall be understood to apply if, in whole or in part, the document or information concerns, deals with, comments upon, responds to, analyzes, evidences, mentions, discusses, constitutes, concerns, embodies, comprises, contains, indicates, states, references, reflects, regards, memorializes, identifies, describes, involves, supports, contradicts, or in any other way pertains to the subject matter of the request.

DOCUMENTS REQUESTED

REQUEST NO. 1. All documents relating to the nature of your business during the Relevant Time Period, including but not limited to:

- (a) All documents identifying the name and address of your business.
- (b) Articles of incorporation or organization, partnership, limited liability corporation agreements and/or joint venture agreements, charters, bylaws, corporate minute books,

and other documents relating to the formation of any business entity in which you owned an interest, either directly or indirectly, or served as an officer or director, during the Relevant Time Period.

- (c) All documents identifying all shareholders, directors, officers, partners, members, managers, or other owners or operators of any business entity in which you owned an interest, either directly or indirectly, or served as an officer or director, during the Relevant Time Period.

REQUEST NO. 2. All documents relating to your revenue during the Relevant Time Period, including but not limited to:

- (a) All documents evidencing all sources of income, revenue, or remuneration of any kind, including payments for goods and services, interest income, operating income, payments on accounts receivable, commissions, agency fees, loan repayments, rents, royalties, license fees, dividends, distributions, payments relating to sales of assets, equipment, or inventory, payments on contracts, or any other payment or remuneration you received in connection with the operation of your business.
- (b) State and federal income tax returns, and all related forms and schedules (including all amended returns, forms, and schedules) filed during or relating to the Relevant Time Period.
- (c) Paystubs, W-2s, 1099s, K-1s, or other evidence of any income, salary, wages, commissions, distributions, or other compensation or remuneration you received, whether as an employee, partner, member, shareholder, independent contractor, or otherwise, during the Relevant Time Period.

- (d) Financial statements, balance sheets, income statements, cash flow statements, and loan applications prepared or submitted by you or on your behalf during the Relevant Time Period.

REQUEST NO. 3. All documents identifying your routine expenses, including but not limited to:

- (a) Operating costs.
- (b) Rental obligations.
- (c) Payroll and benefits.
- (d) Outstanding loans.
- (e) Installment payments.
- (f) Mortgage payments.
- (g) Loan payments and financing charges on vehicles, equipment, and supplies.
- (h) Payments due under contracts.
- (i) Royalty payments and license fees.
- (j) Commissions owed to brokers, dealers, or representatives.
- (k) Legal, accounting, and other professional fees.
- (l) Advertising and marketing costs.
- (m) Other routine debts and expenses that occur on a regular basis.

REQUEST NO. 4. All documents relating to any debts you owed or incurred during the Relevant Time Period, including but not limited to:

- (a) All documents identifying the name of the creditor, the amount owed, when the debt was incurred and for what reason, whether all or any portion of the debt was paid, when all or any portion was paid, and any remaining balance on all such debts.

- (b) All documents on which each such debt is based, including contracts, bills, invoices, statements, agreements, mortgages, loan agreements, and all correspondence and other documents comprising, memorializing, or evidencing communications relating to each such debt.
- (c) All documents relating to or evidencing any payment you made on any such debts.

REQUEST NO. 5. All documents relating to any effort to collect any debt from you by any creditor, collection agency, attorney, or other party acting on behalf of any creditor, including demand letters, default notices, forbearance agreements, collection letters, liens, lis pendens, lawsuits, judgments, petitions, complaints, summonses, or other legal process.

REQUEST NO. 6. All documents relating to any real property you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the Relevant Time Period, including any and all:

- (a) Real estate contracts (purchase or sale).
- (b) Deeds.
- (c) Appraisals.
- (d) Leases.
- (e) Licenses.
- (f) Easements.
- (g) Rights of way.
- (h) Trusts.
- (i) Liens, mortgages, deeds in trust, or other encumbrances.
- (j) Escrow agreements.

- (k) Other documents relating to any such ownership interest.

REQUEST NO. 7. All bank statements, investment statements, or other account statements for any account, including but not limited to checking, savings, IRA accounts, Certificates of Deposit, and other similar savings instruments, which you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the Relevant Time Period, at any bank, brokerage, investment firm, or other financial institution.

REQUEST NO. 8. All documents relating to vehicles, equipment, aircrafts, boats, or other water vessels you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the Relevant Time Period, including but not limited to:

- (a) Titles, licenses, and registrations.
- (b) Sales contracts, bills of sale, and other documents relating to your purchase or ownership of the vehicle, equipment, aircraft, boat, or water vessel.
- (c) Financing documents, loan documents, security agreements, and all other evidence of any other party's lien on or interest in the vehicle, aircraft, boat, or water vessel.
- (d) The name and address of any other party which has a security interest in any vehicle, equipment, aircraft, boat, or water vessel in which you own.
- (e) All documents relating to or evidencing the location of the vehicle, aircraft, boat, or water vessel.

REQUEST NO. 9. All documents relating to any and all corporate property or Assets with a value over \$1,000.00 which you currently own, hold, or claim any type of interest in, directly

or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the Relevant Time Period, including but not limited to:

- (a) Goods.
- (b) Equipment and machinery.
- (c) Inventory.
- (d) Trade fixtures.
- (e) Tools.
- (f) Office equipment and furniture.
- (g) Computer equipment, including hardware and networks.
- (h) Household furnishings, appliances, electronics, computer equipment, televisions, stereos, audiovisual equipment, and fixtures.
- (i) Jewelry, artwork, antiques, collectibles, and heirlooms.
- (j) Clothing.
- (k) Cash.
- (l) Precious metals.
- (m) Appraisals, invoices, bills of sale, and other documents relating to or evidencing the value, purchase, receipt, possession, or ownership of any such tangible personal property.
- (n) Contracts.
- (o) Security agreements.
- (p) Stocks, bonds, or other evidence of ownership, equity, or investment in any business entity.
- (q) Patents, copyrights, trademarks, or other evidence of intellectual property rights.
- (r) Technology, including software.
- (s) Accounts receivable.

- (t) Notes receivable.
- (u) Corporate goodwill.
- (v) Research and development.
- (w) Retirement, pension, 401(k), and IRA accounts.
- (x) Annuities.
- (y) All documents relating to or evidencing any other party's interest in or claim to any of your tangible personal property, including all debts or liabilities secured by, or liens, security interests, or other encumbrances in, on, or against the property.

REQUEST NO. 10. All documents sufficient to identify all of your affiliates, subsidiaries, parent companies, or any other company that has or claims an interest in the judgment debtor, including the name, address or location, and state or country of incorporation or organization of any such entity, and the nature of your affiliation or corporate or other organizational relationship with any such entity.

REQUEST NO. 11. All documents relating to any corporation, subsidiary, limited liability company, trust, partnership, or other business entity of any kind or nature in which you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or in which you owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the Relevant Time Period, including but not limited to:

- (a) Articles of incorporation or organization, charters, bylaws, partnership agreements, shareholder agreements, or other formational documents evidencing the existence of the entity.
- (b) All stock certificates or other documents relating to or evidencing your ownership of shares, units, membership interests, partnership interests, or other ownership interest in

the entity.

- (c) Corporate minute books, minutes of organizational meetings, or documents relating to or evidencing the entity's organization, ownership, managerial structure, and adherence to corporate or other organizational formalities.
- (d) Appraisals, valuations, and other documents relating to or evidencing the value of your ownership interest in any such entity.

REQUEST NO. 12. All documents relating to policies of insurance you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or were covered under during the Relevant Time Period, including but not limited to any and all policies, contracts, notices, amendments, modifications, and renewals of any such policy.

REQUEST NO. 13. If you claim that any of your revenue, income, or Assets are exempt from collection, all documents evidencing the basis for such exemption, including any applicable legal authority.

REQUEST NO. 14. All documents relating to or evidencing any income and Assets you obtained through any fundraising effort or mechanism during the Relevant Time Period.

REQUEST NO. 15. All documents relating to any and all debts or liabilities owed to you by third parties, including, but not limited to, all claims, settlement agreements, causes of action, lawsuits, judgments, or liens you now have or had at any time during the Relevant Time Period against any third party.

REQUEST NO. 16. All documents relating to or evidencing any third party's possession, ownership, or control of any of your Assets, in whole or in part, including but not limited to:

- (a) Contractual agreements, including all drafts and markups.
- (b) Certificates of title or deeds.
- (c) Publicly filed documents relating to the third party's possession or ownership interest.
- (d) Correspondence, internal memoranda, notes, or other records relating to the third party's possession or ownership interest.
- (e) Leases, rental agreements, or any other document evidencing a temporary interest of your Assets.

REQUEST NO. 17. All documents relating to or evidencing any transaction in which you transferred any interest in any of your Assets over the value of \$1,000.00, in whole or in part, to any transferee during the Relevant Time Period, including but not limited to:

- (a) Contractual agreements, including all drafts and markups.
- (b) Certificates of title or deeds.
- (c) Publicly filed documents relating to the transaction.
- (d) Correspondence, internal memoranda, notes, or other records relating to the transaction.
- (e) Evidence of any business or familial relationship between you and the transferee.

REQUEST NO. 18. All documents you provided to any transferee in connection with any due diligence it conducted before engaging in any transaction identified in Request No. 17, above.

REQUEST NO. 19. All documents relating to or evidencing any transaction in which you engaged that was outside Famulus during the Relevant Time Period, including but not limited to:

- (a) Contractual agreements, including all drafts and markups.
- (b) Certificates of title or deeds.
- (c) Publicly filed documents relating to the transaction.
- (d) Correspondence, internal memoranda, notes, or other records relating to the transaction.

REQUEST NO. 20. All documents relating to or evidencing any transaction in which you transferred any interest in any of your Assets over the value of \$1,000.00, in whole or in part, to any of your shareholders, directors, officers, partners, members, managers, employees, other owners/operators of any business entity affiliated with you, whether as a subsidiary, sister entity, holding company, and any family members of shareholders, directors, officers, partners, members, managers, or employees, including but not limited to:

- (a) Contractual agreements, including all drafts and markups.
- (b) Certificates of title or deeds.
- (c) Publicly filed documents relating to the transaction.
- (d) Correspondence, internal memoranda, notes, or other records relating to the transaction.

This the ___nd day of November 2024, in Columbia, South Carolina.

MURPHY & GRANTLAND, P.A.

s/DRAFT

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Famulus Health LLC,

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**GOODRX, INC.'S POST-JUDGMENT INTERROGATORIES
TO FAMULUS HEALTH LLC**

Pursuant to Federal Rule of Civil Procedure 69, judgment creditor GoodRx, Inc. (“**GoodRx**”) directs the following post-judgment interrogatories (the “**Interrogatories**” and, each, an “**Interrogatory**”) to judgment debtor Famulus Health LLC (“**Famulus**”). GoodRx demands that Famulus respond to each Interrogatory on or before November 18, 2024.

DEFINITIONS

1. “Judgment” means the money judgment entered on September 11, 2024 in the above-referenced action between GoodRx and Famulus [Case No. 9:24-mc-00126-BHH, ECF No.

55; Case No. 9:24-cv-00886-BHH, ECF No. 75].

2. “Judgment debtor” or “you” or “your” means Famulus, its subsidiaries, divisions, predecessor and successor companies, affiliates, any partnership or joint venture to which it may be a party, and/or each of its employees, agents, member, officers, directors, representatives, consultants, accountants, and attorneys, including, specifically, Michael Szwajkos, and any person who served in any such capacity at any time during the Relevant Time Period specified herein.

3. “Revenue” or “income” means any and all money, earnings, revenue, or payments of any kind that you received in any form, whether in cash or by check, credit or debit card, electronic transfer, or otherwise, including but not limited to payments for goods and services, payments on accounts receivable, loan repayments, interest income, rents, royalties, license fees, commissions, dividends, distributions, payments relating to sales of Assets, equipment, or inventory, payments on contracts, or any other payment or remuneration you received in connection with the operation of your business.

4. “Asset” or “Assets” means any property or thing of value you owned, claimed, or held any interest in, in whole or in part, including any and all real property, tangible personal property including cash, vehicles, goods, inventory, machinery, equipment, trade fixtures, office equipment, supplies, technology, software, hardware, computer systems and networks, and intangible personal property including goodwill, contracts, accounts receivable, notes receivable, stocks, bonds, and other securities, ownership interest in any other entities such as subsidiary corporations, general or limited partnerships, and joint ventures, intellectual property rights including copyrights, patents, trademarks, and trade names, and insurance policies which you own or which name you as an insured.

5. The “Relevant Time Period” means the time period from February 1, 2023 to the present.

6. “Document” is used in its broadest sense, and includes any written, printed, typed,

recorded, electronic or graphic matter of every type, however and by whomever prepared, produced, reproduced, disseminated or made, in any form, including but not limited to, letters, calendars, correspondence, email, telegrams, memoranda, electronic files, spreadsheets, databases, records, minutes, contracts, agreements, leases, communications, microfilm, bulletins, circulars, pamphlets, studies, reports, notices, diaries, summaries, books, messages, instructions, work assignments, notes, notebooks, drafts, data sheets, data compilations, worksheets, statistics, speeches, tapes, tape recordings, magnetic, photographic, and any other writings or sound recordings. For the avoidance of doubt, “document” includes any version, copy, or reproduction not identical to the original or a produced copy.

7. “Relating to” shall be understood to apply if, in whole or in part, the document or information concerns, deals with, comments upon, responds to, analyzes, evidences, mentions, discusses, constitutes, concerns, embodies, comprises, contains, indicates, states, references, reflects, regards, memorializes, identifies, describes, involves, supports, contradicts, or in any other way pertains to the subject matter of the request.

INTERROGATORIES

INTERROGATORY NO. 1. Describe your business during the Relevant Time Period, including but not limited to:

- (a) The nature of your business and the individual services or products you offer.
- (b) The name, address, and state of incorporation or organization of any corporate or other business entity you owned or operated during the Relevant Time Period.
- (c) The shareholders, directors, officers, partners, members, managers, or other owners or operators of any entity identified in response to Interrogatory No. 1(b), above.

INTERROGATORY NO. 2. Identify and describe your revenue during the Relevant Time Period, including the amounts, on a source by source basis, including but not

limited to:

- (a) All sources of income, revenue, or remuneration of any kind, including payments for goods and services, interest income, operating income, payments on accounts receivables, commissions, agency fees, loan repayments, rents, royalties, license fees, dividends, distributions, payments relating to sales of Assets, equipment, or inventory, payments on contracts, or any other payment or remuneration you received in connection with the operation of your business.
- (b) Income declared on state and federal income tax returns, and all related forms and schedules (including all amended returns, forms, and schedules) filed during or relating to the Relevant Time Period.

INTERROGATORY NO. 3. Identify all documents evidencing your revenue referenced in Interrogatory No. 2, above.

INTERROGATORY NO. 4. Identify and describe your routine expenses, including the amounts, on an expense by expense basis, including but not limited to:

- (a) Operating costs.
- (b) Rental obligations.
- (c) Payroll and benefits.
- (d) Outstanding loans.
- (e) Installment payments.
- (f) Mortgage payments.
- (g) Loan payments and financing charges on vehicles, boats, aircraft, equipment, and supplies.
- (h) Payments due under contracts.

- (i) Royalty payments and license fees.
- (j) Commissions owed to brokers, dealers, or representatives.
- (k) Legal, accounting, and other professional fees.
- (l) Advertising and marketing costs.
- (m) Depreciation of equipment or machinery.
- (n) Other routine debts and expenses that occur on a regular basis.

INTERROGATORY NO. 5. Identify all documents evidencing your routine expenses referenced in Interrogatory No. 4, above.

INTERROGATORY NO. 6. Identify and describe all debts and liabilities you owed or incurred during the Relevant Time Period, including the amounts, on a debt by debt, or liability by liability basis, including:

- (a) The name, address, and telephone number of the creditor.
- (b) The amount owed.
- (c) When the debt was incurred and for what reason.
- (d) Whether all or any portion of the debt is paid.
- (e) When all or any portion was paid.
- (f) Whether the debt is secured and, if so, how it is secured.
- (g) Any remaining balance on all such debts.

INTERROGATORY NO. 7. Identify all documents evidencing your debts and liabilities referenced in Interrogatory No. 7, above.

INTERROGATORY NO. 8. Identify all efforts to collect any debt from you by any creditor, collection agency, attorney, or other party acting on behalf of any creditor, including receiving demand letters, default notices, forbearance agreements, collection letters, liens, lis pendens, lawsuits, judgments, petitions, complaints, summonses, or other legal process.

INTERROGATORY NO. 9. Identify all legal actions in which you have been or are a party during the Relevant Time Period, including:

- (a) The title of the case.
- (b) The name of the court where the action is or was pending.
- (c) The docket number of the case.
- (d) A description of the case.
- (e) The outcome of the case, if applicable (for example, a judgment for money damages against you or the other party).

INTERROGATORY NO. 10. Identify all individuals, institutions, and other entities that owe you debts or liabilities, including:

- (a) The name, address, and telephone number of the debtor.
- (b) The amount of the debt or liability owed per debtor as of (i) February 1, 2023, (ii) February 15, 2024, and (iii) the date upon which you serve responses to these Interrogatories.
- (c) Whether the debt is secured, and if so, how.
- (d) The maturity date of the debt.
- (e) Whether any debt has become uncollectable.

INTERROGATORY NO. 11. Identify all documents evidencing all debts and liabilities owed to you, as referenced in Interrogatory No. 10, above.

INTERROGATORY NO. 12. Identify all persons who executed a guarantorship or suretyship on your behalf for any of your Assets or liabilities.

INTERROGATORY NO. 13. Identify and describe your expected revenue within the next twelve months from any of your Assets on an Asset by Asset basis, including but not limited to expected payments on any contracts that you have entered, revenue from leasing equipment or real property, or any award of money judgment.

INTERROGATORY NO. 14. Identify and describe all real property you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any interest in, directly or indirectly, in whole or in part, during the Relevant Time Period, including:

- (a) The property's address.
- (b) The purchase price.
- (c) The current fair market value.
- (d) The type of real property.
- (e) How the property is currently titled.
- (f) How the property was titled when first purchased.
- (g) Your interest in the property.
- (h) The identity of any third parties who possess or claim to possess an ownership interest in the property.
- (i) Any debts, liabilities, liens, or other encumbrances against the property.

INTERROGATORY NO. 15. Identify all documents evidencing your interest in real property, referenced in Interrogatory No. 14, above.

INTERROGATORY NO. 16. Identify all banks, brokerage firms, investment firms, or other financial institutions for any account, including but not limited to checking, savings, IRA accounts, Certificates of Deposit, and other similar savings instruments, which you currently own, hold, or claim an interest in, in whole or in part, or owned, held, or claimed an interest in, in whole or in part, during the Relevant Time Period, including:

- (a) The bank, investment firm, or other financial institution name, address, and telephone number.
- (b) The name under which the account is titled.
- (c) The account number.
- (d) The account type.
- (e) The account balance each month from February 1, 2023 to present.
- (f) The identity of any third parties who possess or claim to possess an ownership interest in the property.
- (g) Any debts, liabilities, liens, or other encumbrances against the accounts.

INTERROGATORY NO. 17. Identify all documents evidencing your interest in any accounts at banks, brokerage firms, investment firms, or other financial institutions, referenced in Interrogatory No. 16, above.

INTERROGATORY NO. 18. Identify and describe all vehicles, equipment, aircraft, boats, or other water vessels you currently own, hold, or claim an interest in, directly or

indirectly, in whole or in part, or owned, held, or claimed an interest in, directly or indirectly, in whole or in part, during the Relevant Time Period, including:

- (a) The property's current location.
- (b) The property's purchase price.
- (c) The current fair market value.
- (d) The type of property.
- (e) How you acquired an ownership interest or claim in the property.
- (f) Your current ownership interest or claim in the property.
- (g) The identity of any third parties who possess or claim to possess an ownership interest in the property.
- (h) Any debts, liabilities, liens, or other encumbrances against the property.

INTERROGATORY NO. 19. Identify all documents evidencing your interest in any vehicles, aircraft, boats, or other water vessels, referenced in Interrogatory No. 18, above.

INTERROGATORY NO. 20. Identify and describe any and all corporate property—tangible and/or intangible—with a value over \$1,000.00 which you currently own, hold, or claim an interest in, directly or indirectly, in whole or in part, or owned, held, or claimed an interest in, directly or indirectly, in whole or in part, during the Relevant Time Period, including:

- (a) The type of property, including, but not limited to:
 - i. Goods.
 - ii. Equipment and machinery.
 - iii. Inventory.
 - iv. Trade fixtures.
 - v. Tools.

- vi. Office equipment and furniture.
 - vii. Computer equipment, including hardware and networks.
 - viii. Household furnishings, appliances, electronics, computer equipment, televisions, stereos, audiovisual equipment, and fixtures.
 - ix. Jewelry, artwork, antiques, collectibles, and heirlooms.
 - x. Clothing.
 - xi. Cash.
 - xii. Precious metals.
 - xiii. Contracts.
 - xiv. Security agreements.
 - xv. Stocks, bonds, or other evidence of ownership, equity, or investment in any business entity, including number of units owned.
 - xvi. Patents, copyrights, trademarks, or other evidence of intellectual property rights.
 - xvii. Technology, including software.
 - xviii. Accounts receivable.
 - xix. Notes receivable.
 - xx. Chattel paper.
 - xxi. Corporate goodwill.
 - xxii. Research and development.
 - xxiii. Retirement, pension, 401(k), and IRA accounts.
 - xxiv. Annuities.
- (b) The property's current location.
 - (c) The property's purchase price.
 - (d) The current fair market value.

- (e) How you acquired an ownership interest or claim in the property.
- (f) Your current ownership interest or claim in the property.
- (g) The identity of any third parties who possess or claim to possess an ownership interest in the property.
- (h) For each of the items identified in Interrogatory 20(a)(i) through (a)(xxiv) provide the current balance due on any liens/encumbrances and the name address of the lienholder.

INTERROGATORY NO. 21. Identify all documents evidencing your interest in any and all other tangible corporate property, referenced in Interrogatory No. 20, above.

INTERROGATORY NO. 22. Identify all documents evidencing your interest in any and all Assets.

INTERROGATORY NO. 23. Identify and describe all of your affiliates, subsidiaries, parent companies, or any other company that has or claims an interest in the judgment debtor, including the name, address or location, and state or country of incorporation organization of any such entity, and the nature of your affiliation or corporate or other organizational relationship with any such entity.

INTERROGATORY NO. 24. Identify all corporations, subsidiaries, limited liability companies, trusts, partnerships, or other business entity of any kind or nature in which you currently own, hold, or claim an interest in, in whole or in part, or owned, held, or claimed an interest in, in whole or in part, during the Relevant Time Period, and describe that relationship.

INTERROGATORY NO. 25. Identify all documents evidencing your interest in any corporations, subsidiaries, limited liability companies, trusts, partnerships, or other business entity, referenced in Interrogatory No. 23 above.

INTERROGATORY NO. 26. Identify all policies of insurance you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or were covered under during the Relevant Time Period, including:

- (a) The name, address, and telephone number of the insurance company.
- (b) The policy number.
- (c) The policy amount.
- (d) The type of policy.
- (e) The present cash or surrender value.
- (f) The amount of accumulated dividends, if any.
- (g) The time period covered under the policy.

INTERROGATORY NO. 27. Identify all documents regarding any and all policies of insurance, referenced in Interrogatory No. 25, above.

INTERROGATORY NO. 28. Identify any safe deposit boxes you either rent or have access to currently or during the Relevant Time Period, including:

- (a) The name, address, and telephone number of the entity or person under whose name the safe deposit box is rented.
- (b) The name, address, and telephone number of the financial institution or other entity at which the safe deposit box is located.
- (c) A description of the contents of the safe deposit box as of (i) February 1, 2023, (ii)

February 15, 2024, and (iii) the date upon which you serve responses to these Interrogatories.

INTERROGATORY NO. 29. Identify all revenue, income, or Assets you claim exempt from judgment enforcement in this action and state the basis for the exemption, including applicable legal authority.

INTERROGATORY NO. 30. Identify and describe all income and Assets you obtained from the use of a fundraising platform by you or any party acting on your behalf, during the Relevant Time Period, including:

- (a) The name, address, and telephone number of the fundraising platform.
- (b) The time period the fundraising platform is or was active.
- (c) The cash value of the subject fund as of (i) February 1, 2023, (ii) February 15, 2024, and (iii) the date upon which you serve responses to these Interrogatories.
- (d) The website of the fundraising platform.

INTERROGATORY NO. 31. As to each Asset identified by you in response to these interrogatories, identify any third party that currently possesses, owns, or controls that Asset, in whole or in part, such as:

- (a) Corporate affiliates, subsidiaries, parent companies, partners, or any other related corporate entity.
- (b) Banks, financial institutions, and brokerage firms.
- (c) Accountants.
- (d) Business partners.
- (e) Friends, family members, and associates with whom you conducted business during

the Relevant Time Period.

- (f) Other individuals, institutions, and entities that hold your Assets.

INTERROGATORY NO. 32. Identify the Asset or Assets possessed, owned, or controlled, in whole or in part, by the third parties referenced in Interrogatory No. 30, above.

INTERROGATORY NO. 33. Identify all documents evidencing the Asset or Assets possessed, owned, or controlled, in whole or in part, by the third parties referenced in Interrogatory No. 30, above.

INTERROGATORY NO. 34. Identify all transferees of any of your income or Assets over the value of \$1,000.00, in whole or in part, during the Relevant Time Period, or that are transferees of an ownership interest in any of your income or Assets over the value of \$1,000.00, in whole or in part, during the Relevant Time Period, including:

- (a) Banks, financial institutions, brokerage firms, and investment firms.
- (b) Accountants.
- (c) Business partners.
- (d) Friends, family members, and associates.
- (e) Other individuals, institutions, and entities.

INTERROGATORY NO. 35. Identify the income or Assets transferred to any third party, referenced in Interrogatory No. 33, above.

INTERROGATORY NO. 36. Identify all documents evidencing transfers of your income or Assets to any third party, referenced in Interrogatory No. 33, above.

INTERROGATORY NO. 37. Identify and describe any transaction in which you engaged that was outside Famulus during the Relevant Time Period, including but not limited to any transaction involving:

- (a) Contractual agreements.
- (b) Certificates of title or deeds.
- (c) Publicly filed documents.

This the ___nd day of November 2024, in Columbia, South Carolina.

MURPHY & GRANTLAND, P.A.

s/DRAFT

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